# 6.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines §15128 requires the identification of project impacts that were determined not to be significant and that were not discussed in detail in the impact section of the EIR. Therefore, a brief discussion of environmental issues that were not found to be significant for this project is presented below. The environmental issues not expected to have a significant impact as a result of the proposed project are Air Quality, Utilities/Service Systems, Transportation/Traffic, Paleontological Resources, ~~and~~ Public Services, and Hydrology/Water Quality.

**Final EIR Introduction**

This section has been changed subsequent to the public review of the February 2005 Draft EIR and the April 2008 Revised Draft EIR as follows:

1. Section 6.1.2 Utilities/Service Systems was updated to reflect the updated Water System Evaluation (RMWD, 2009).
2. Section 6.1.3 Hydrology/Water Quality was updated to reflect the County's current SUSMP (2008) and the project's SWMP (Fuscoe, 2009).
3. Section 6.2.2 Transportation/Traffic was updated to reflect the traffic study update (Linscott, Law & Greenspan).
4. Section 6.2.4.2 Fire Protection was revised to clarify emergency response times.

## 6.1 Effects Found not to be Significant as Part of the EIR Process

The following are the environmental issues that were found not to be significant as part of the EIR process:

### 6.1.1 Air Quality

The Environmental Initial Study identified odor impacts due to the package wastewater system component of the project as a potentially significant Impact. All other Air Quality impacts were identified as not significant during preparation of the Environmental Initial Study. However, the package wastewater system has been replaced with a standard septic tank and leach field system which is a below ground and is self-contained and sealed. This system would not produce objectionable odors. There are no other proposed uses which would produce odor or result in a significant odor Air Quality impact.

The proposed excavation of the existing landfill area will be performed in order to minimize any short-term odor causing impacts. Immediately after landfill materials have been excavated, they will be transported to the Ramona Landfill and the excavated area would be back filled. This would ensure that any odors associated with the excavation and removal of landfill materials would be temporary and impacts from odors would not be significant. There are no other uses on-site or off-site that would cause potential air quality impacts associated with odor.

## 6.1.2 Utilities/Service Systems

### *6.1.2.1 Domestic Potable Water*

The primary source of potable water for San Diego County is provided by the San Diego County Water Authority (CWA). The CWA, the regional purveyor of water to San Diego County, receives its imported water exclusively from the Metropolitan Water District (MWD) of Southern California, of which it is a member agency. The CWA purchases treated and untreated water from MWD and distributes it to member agencies on a wholesale basis. The MWD's two primary water resources are the Colorado River and the California State Water Project. The CWA has also been negotiating with the MWD and Imperial Irrigation District to acquire additional sources of water.

Domestic water for the project site would be provided by the Ramona Municipal Water District (RMWD). The existing camp includes water infrastructure including a 10,000 gallon water tank and pump located on the hillside near the existing office and camping facilities. Water is supplied to the Salvation Army Divisional Camp by an existing six-inch water main. This pipe runs along side of Rosemont Grade Road on the northeast side of the project. At the junction between Rosemont Grade Road and Mussey Grade Road, the water main bends southeast and continues parallel to Mussey Grade Road, running out to San Vicente Reservoir.

Two wells and a natural spring are located within the project site. The wells, which are currently not in use, and not proposed for use under the project, are located in the vicinity of the existing administration office and within the camping area. In addition, the camp is not using the spring located near the maintenance building. The spring has been fenced off to prevent any potential danger to visitors. There is also an existing cistern which collects rainwater for irrigation located adjacent to the existing maintenance facility.

The proposed project includes annexation of a 10.8-acre parcel located in the northcentral portion of the project site where the educational camp is proposed. However, the RMWD, in a 'will-serve' letter dated December 23, 2009 ~~November 27, 2001~~ (included in Appendix H to this EIR) noted the District has adequate facilities to serve the project including the area proposed for annexation.

At buildout, the Salvation Army Divisional Camp could require roughly ~~75,000~~ 56,901 gallons of water per day, which includes approximately ~~25,000~~ 13,101 gallons for irrigation water and ~~50,000~~ 43,800 GPD for potable water use. Water conserving techniques will be implemented through project design and will include ultra-low, flow-type toilets and two-handle type faucets with flow restrictors for lavatory and shower assemblies. In addition, native plants, which have low water requirements, will be used for landscaping in order to minimize demand for irrigation water. ~~An additional supply of 625 gallons per minute (gpm) [check this based on new report] would be needed for fire flow. Note that the standard fire flow requirement of 2,500 gpm is decreased for projects that include sprinkler systems; sprinkler systems will be installed in all existing and proposed buildings at the camp.~~

The combined need for potable water and fire flow demands cannot be met with the existing six-inch water line in the area. However, the fire flow requirements for the proposed project (2,500 gallons per minute (gpm)) would be met with proposed water infrastructure improvements. ~~However, all existing and~~

~~proposed buildings will be retrofitted with fire sprinklers, which would reduce fire flow requirements by 75 percent, bringing flow requirements down to 625 gpm.~~ The proposed ~~260,000-gallon~~ 650,000-gallon tank (expandable to 800,000 gallons) ~~water tank~~ and supporting on-site pipeline infrastructure would achieve fire flow requirements of ~~625~~ 2,500 gpm for the project and would not require an upgrade to the existing water line in Mussey Grade Road. Therefore, a significant impact to water service would not occur.

### *6.1.2.2 Energy Facilities*

Electricity is provided to the project area by San Diego Gas & Electric Company (SDG&E). The Salvation Army Divisional Camp has an electrical system that includes 12 kV electrical lines located throughout the project site. San Diego Gas & Electric, has indicated that adequate facilities exist to serve future phases of the proposed project. SDG&E officials have verified that SDG&E would install any needed facilities to meet the Salvation Army Camp's requirements. Therefore, the electricity requirements are not a significant impact to San Diego Gas & Electric service (San Diego Gas & Electric, L. Kingdig, 2000).

### *6.1.2.3 Wastewater Treatment*

The Salvation Army Divisional Camp is not within the RMWD sewer service area. All sewer services are supplied on-site through existing septic tanks and leach fields. The site contains seven leach fields that presently dispose of the on-site wastewater. At build-out the Salvation Army Camp would use an average ~~75,000~~ 56,901 gallons of water per day during peak season. To adequately dispose of the wastewater, the project site would require an additional 12 acres of leech fields. Additional sewage service will be accommodated with an expanded, standard on-site septic tank and leach field system. This system is an on-site subsurface sewage disposal system that is designed to have the sewage treated through soil percolation. The key components are a septic tank, leach lines, or seepage pit, and permeable, unsaturated soil. As required by County Code, a 100 percent reserve or expansion area for the sewage disposal system is provided on-site. The system will also require DEH review and approval prior to construction. DEH most recently reviewed, and has approved the septic plan on December 21, 2009. Therefore, the project would comply with County Code requirements, as required by DEH, and impacts associated with wastewater treatment would not be significant.

### *6.1.2.4 Solid Waste*

Solid waste generated from the community of Ramona is disposed of in the Ramona Landfill, located at 20630 Pamo Road. The Ramona Landfill is owned and operated by Allied Waste Industries. The landfill accepts a maximum of 295 tons of trash per day and has a remaining volume of approximately 690,000 cubic yards. Expansion plans for the landfill were approved in 1986 and an expansion of the landfill is currently in process. This approved expansion is projected to provide additional capacity to the Ramona Area for 15 to 20 years of continued operation (Pers. Comm., Dare, 2001).

The Salvation Army Divisional Camp and Retreat currently uses two five-cubic yard capacity dumpsters that are collected weekly. The proposed project would expand camp capacity. It is estimated that an additional 30-cubic yards of on-site trash capacity would be required, for a total of 40 cubic yards. If maximum trash capacity were reached every week of the year, the expanded camp would contribute 2,080 cubic yards of trash to the Ramona Landfill annually.

Based on discussions with Richard Dare (Pers. Comm., Dare, 2001), the materials excavated from the existing on-site landfill will be accommodated at the Ramona Landfill. When plans for the excavation are finalized, the contractor will contact the landfill operator to ensure that delivery of the materials on the planned date would not put the landfill over its maximum daily allowance of 295 tons. At peak season the Salvation Army Divisional Camp and Retreat would not effect the Ramona Landfill capacity, nor, would the project contribute to any expansions of the existing landfill. No significant impact would occur.

## 6.1.3 Hydrology/Water Quality

A Storm Water Management ~~and Maintenance~~ Plan (SWM~~M~~P) has been prepared for the proposed project (FUSCOE, ~~2003~~2009) (Appendix G). The SWM~~M~~P addresses site hydrology, soil conditions, potential pollutants, proposed Best Management Practices (BMPs), and a maintenance plan. The following discussion summarizes the SWM~~M~~P.

BMP's have been incorporated into the project in order to minimize project impacts per the County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO)(~~Ordinance Nos. 9424 and 9426,~~ County Codes ~~§§~~ Section 67.801 et seq.). The BMPs are part of the project design and will also be included as conditions of approval if the County approves the Major Use Permit for the project.

The following Construction BMPs from the California Storm Water Quality Association (CASQA) BMP Handbook can be implemented for the project's Storm Water Pollution Prevention Plan (SWPPP):

Erosion Controls

- EC-1 Scheduling
- EC-2 Preservation of Existing Vegetation
- EC-5 Soil Binders
- EC-6 Straw Mulch
- EC-7 Geotextiles and Mats
- EC-8 Wood Mulching
- EC-9 Earth Dikes and Swales
- EC-10 Velocity Dissipation Devices
- EC-11 Slope Drains

Sediment Controls

- SE-1 Silt Fence
- SE-2 Desilting Basin
- SE-3 Sediment Trap
- SE-4 Check Dam
- SE-5 Fiber Rolls
- SE-7 Street Sweeping
- SE-8 Sandbag Barrier
- SE-9 Straw Bale Barrier
- SE-10 Storm Drain Inlet Protection
- SE-11 Chemical Treatment

Tracking Controls

- TC-1 Stabilized Construction Entrance / Exit
- TC-2 Stabilized Construction Roadway

TC-3 Entrance / Outlet Tire Wash
WE-1 Wind Erosion Control

Non-Storm Water Management Controls

| | | | |
|---|---|---|---|
| NS-1 | Water Conservation Practices | NS-9 | Vehicle & Equipment Fueling |
| NS-2 | Dewatering Operations | NS-10 | Vehicle & Equipment Maint. |
| NS-3 | Paving and Grinding Operations | NS-11 | Pile Driving Operations |
| NS-4 | Temporary Stream Crossing | NS-12 | Concrete Curing |
| NS-5 | Clear Water Diversion | NS-13 | Concrete Finishing |
| NS-6 | IC/ID Detection and Reporting | NS-14 | Material Use Over Water |
| NS-7 | Potable Water / Irrigation | NS-15 | Demolition Over Water |
| NS-8 | Vehicle & Equipment Cleaning | NS-16 | Temporary Batch Plants |

Waste Management and Materials

| | | | |
|---|---|---|---|
| WM-1 | Material Delivery & Storage | WM-6 | Hazardous Waste |
| WM-2 | Material Use | WM-7 | Contaminated Soil |
| WM-3 | Stockpile Management | WM-8 | Concrete Waste |
| WM-4 | Spill Prevention and Control | WM-9 | Sanitary / Septic Waste |
| WM-5 | Solid Waste Management | | |

**Monitoring Program**

A monitoring program will also be included in the SWPPP that outlines storm event inspections of the site and a sampling plan in accordance with the General Construction Permit (GCP). "The goals of [the program] are (1) to identify areas contributing to a storm water discharge; (2) to evaluate whether measures to reduce pollutant loadings identified in the SWPPP are adequate, properly installed, and functioning in accordance with the terms of the General Permit; and (3) whether additional control practices or corrective maintenance activities are needed." If a discharge is observed during these inspections, a sampling and analysis of the discharge is required.

Sampling and Analysis

"Any breach, malfunction, leakage, or spill observed which could result in the discharge of pollutants to surface waters that would not be visually detectable in storm water shall trigger the collection of a sample of discharge…The goal of the sampling and analysis is to determine whether the BMPs employed and maintained on site are effective in preventing the potential pollutants from coming in contact with storm water and causing or contributing to an exceedance of water quality objectives in the receiving waters." In any case of breakage and potential for non visible pollution, sampling and analysis will be required to ensure that the beneficial uses of downstream receiving waters are protected. In addition, sampling is required for any site which directly discharges runoff into a receiving water listed in the Attachment 3 of the GCP listed as impaired for sedimentation.

~~Construction BMPs from the Caltrans Storm Water Quality Handbook (2002) will be implemented as follows (the Caltrans detail is listed next to each BMP):~~

- ~~Silt Fence (SC-1)~~
- ~~Desilting Basins (All desilting basins have been sized according to the County of San Diego's design standards and designed by a registered civil engineer)~~
- ~~Stockpile Management (WM-3)~~
- ~~Storm Drain Inlet Protection (SC-10)~~
- ~~Material Delivery and Storage (WM-1)~~
- ~~Material Use (WM-2)~~
- ~~Concrete Waste Management (WM-8)~~
- ~~Paving and Grinding Operations (NS-3)~~
- ~~Solid Waste Management (WM-5)~~
- ~~Vehicle and Equipment Maintenance (NS-10)~~
- ~~Water Conservation Practices (NS-1)~~
- ~~Preservation of Existing Vegetation (SS-2)~~
- ~~Street Sweeping and Vacuuming (SC-7)~~
- ~~Spill Prevention and Control (WM-4)~~

Project post-construction BMPs include the following site design BMPs, low impact development BMPs, and source control BMPs:

**Site Design BMPs**

The project includes both standard Site Design BMPs based on County of San Diego principles contained in the County of San Diego Standard Urban Storm Water Mitigation Plan (SUSMP) manual, as well as project specific BMPs. The site design principles outlined in the County of San Diego SUSMP Manual are listed below.

STEP 1: MAINTAIN PRE-DEVELOPMENT RAINFALL RUNOFF CHARACTERISTICS

| DESIGN CONCEPT | DESCRIPTION |
|---|---|
| MINIMIZE IMPERVIOUS FOOTPRINT | The width of parking areas, sidewalks and private roads have been kept to the minimum required. In addition, the number of street cul-de-sacs has been minimized and landscaped areas have been incorporated to reduce their impervious cover. Where possible, proposed |

| DESIGN CONCEPT | DESCRIPTION |
|---|---|
| | roadways and parking areas are proposed to be constructed with native granular soils and existing unpaved roadways are proposed to remain unpaved unless otherwise required by the fire department. |
| CONSERVE NATURAL AREAS | A vast amount of open space will be preserved for the project area. |
| MIMIMIZE DCIAS (DIRECTLY CONNECTED IMPERVIOUS AREAS) | Vegetated swales, extended detention basins, cisterns receiving roof runoff, and rain gardens are proposed onsite. In total, the project proposed minimal DCIAs, and has a significant amount of water quality features designed to minimize "hard piping" to storm drain.<br><br>Where landscaping is proposed, the project will drain rooftops, sidewalks, walkways, and other impervious areas into landscaping where feasible. This will be designated and designed upon final engineering. |

| STEP 2: PROTECT SLOPES AND CHANNELS |
|---|
| Slopes located in the open space areas will be predominately undisturbed by the proposed project. Proposed slopes will be adequately vegetated and stabilized during and after construction. Runoff will be routed away from the top of steep slopes. Where possible, proposed construction is located outside of existing channels. |

Projet specific Site Design BMPs include the following:

- The proposed site expansion has been significantly reduced to leave more undisturbed land and natural water quality treatment. ~~The original plan had a maximum capacity of 1,000 people and included 75 buildings with additional remote camping and 35 R.V. hookups with a shower building. The proposed site has been reduced to a maximum capacity of 748 people with 65 buildings, and no R.V.s.~~
- Steep slopes and high erosion areas have been avoided to the extent feasible in the site plan to minimize any potential erosion.
- Approximately 30 percent of the site, at the western end of the site, is being dedicated as open space easement. This guarantees that this area will remain undeveloped and natural.
- Landscape is provided around much of the disturbed areas to act as natural water quality treatment facilities.
- A ridge/grade break will be provided around the fuel tank area to prevent any drainage runoff from the fueling area. Precautions will be taken to ensure no spills enter the drainage facilities in the

vicinity. A spill response procedures and spill response kit will be located at the fueling facility. Any drainage structures near the fueling area will be fitted with catch basin inserts.

- Concrete pavement will be provided in the area under the fuel tank and will extend at least 6.5 feet from the corner of each fuel dispenser, as detailed in the County of San Diego's Storm Water Standards Manual.
- ~~Asphalt berms will be provided along steep roads (grades greater than 10 percent) in areas 3, 5, and 6 to minimize the erosion along the roads (Civil Grading Plans for Areas 3, 5, and 6).~~
- Runoff from Area 1 will be captured at various points by drainage pipes and released toward natural open space. This travel through open space allows for natural water quality treatment, as emphasized by the County. In addition, the flow will be spread out to decrease the discharge velocity (Civil Grading Plans for Area 1 for drainage flows).
- Runoff in Areas 2-6 will be directed toward vegetated swales which will also provide natural water quality treatment (Civil Grading Plans for swale locations).
- The overflow parking in Area 5 will be constructed of decomposed granite to decrease the amount of impervious area on-site.
- Riprap will be placed at detention basin outlet points to dissipate energy.
- Use of nutrient rich fertilizers will be minimized.
- Native species will be used as much as possible in landscaping to limit the amount of irrigation and fertilizers required.

**Low Impact Development BMPs**

The project includes Low Impact Development (LID) BMPs based on County of San Diego design concepts. The design concepts outlined in the County of San Diego SUSMP Manual are listed below.

1. Conserve natural Areas, Soils, and Vegetation-County LID Handbook 2.2.1

| LID DESIGN CONCEPT | DESCRIPTION |
|---|---|
| Preserve well draining soils (Type A or B) | There are Type B Soils located throughout the majority of the site. The only location of Type C soils is in the southeast portion of the site where Area 1 and the southwesterly portion of Area 2 are located. See attachment C for relevant information from the USDA Soil Maps. Where feasible, locations of Type B soils are being preserved. |
| Preserve Significant Trees | A large number of significant trees will be preserved as the vast majority of the property will remain undisturbed. |
| Other. Description: | All natural vegetation and habitats will be preserved in areas that are to remain undisturbed. |

2. Miimize Disturbance to Natural Drainages-County LID Handbook 2.2.2

| LID DESIGN CONCEPT | DESCRIPTION |
|---|---|
| Set-back development envelope from drainages | Development will not be located in areas of major drainage. |
| Restrict heavy construction equipment access to planned green/open space areas. | Heavy construction equipment will not be permitted to encroach upon open space areas unless it is unavoidable regarding the construction of a portion of the proposed project. |
| Other: Description | |

- Employees of the camp/retreat site will receive training regarding the proper disposal of chemicals and grease, swimming pool water, landscape debris, and litter.
- When the swimming pool is emptied, discharge water will be de-chlorinated with a de-chlorination kit to less than one PPM chlorine, as stated in County Code Section 67.805.(d)(9).~~67.806 of Ordinance No. 9424.~~ When the filters are cleaned or backwashed, the water will go into a septic tank that leeches into the ground. The amount of water associated with backwashing the filters is relatively small and can be handled by the camp's leech fields.
- Swimming pool chemicals will be stored in a locked, gated area in secondary containment wells. The wells protect against potential leaks. The chemicals themselves are stored in plastic covered drums.
- Grease traps will be constructed with the kitchen to limit any pollution from excess grease.
- The litter in the various site trash cans will be emptied after each meal and disposed of in the large, covered dumpsters. General grounds maintenance will occur at least once a week. During that time, the maintenance staff will remove any trash left on the camp ground.
- The managerial staff will conduct a review of the facilities periodically to ensure the BMPs are being practiced and are functioning effectively.
- The majority of vehicle maintenance will be minor, such as changing spark plugs and oil. Major vehicle repairs and maintenance will be done off-site at an auto facility. Vehicles and equipment will be maintained and serviced per the guidelines set forth in the County of San Diego's Storm Water Standards Manual, Section C.3.2 ~~(Appendix G).~~
- Landscape debris will be disposed of in covered trash receptacles.
- Absorbent rags will be kept readily accessible in the maintenance areas for spill response.
- Parking lots will be swept ~~periodically~~ using street sweepers or manually. Only dry methods will be allowed. Sweeping of parking areas and/or roadways paved with asphalt will occur monthly during the first year after the project is completed. After the first year, frequency of sweeping will be reconsidered and adjusted to ensure that run-off would not contain pollutants.

- Two five-gallon covered buckets will be located on-site to store waste oil and used oil filters for proper disposal and recycling.
- The San Diego County Department of Environmental Health (DEH) requires a Business Plan for businesses which use, handle, or store more than 55 gallons of hazardous substance. The Business Plan contains basic information about the location, type, quantity, and health risks of the hazardous materials stored, used or disposed of by a business. The Salvation Army currently has a Business Plan for the two above ground fuel storage tanks (Hazardous Materials Business Plan H35642). The existing Business Plan will be amended and approved by DEH prior to any activity involving the tanks. Upgrades to the tanks will be performed if determined necessary by the DEH or any other governing agency.
- Since the site has a business plan, DEH will visit the site twice a year to inspect for compliance with regulations. In addition, the business plan is reviewed every three years.
- Fuel tanks are fueled by the Ramona Oil Company, Inc., an industry professional.
- Prior to relocating the tanks, consultation with the Ramona Fire Department is required regarding specific tank details.
- AmeriGas maintains the propane gas tanks on-site. They are checked bi-monthly by AmeriGas personnel. If a leak is noticed, AmeriGas will repair the leak.
- Chemicals and maintenance materials such as paint thinners and acetone will be stored in the supply storage building in the maintenance area, Area 5, under cover. This cover will limit any possible contact with runoff and storm water.
- All maintenance activities will be performed in the new maintenance building, under cover also. Materials and waste will be kept indoors and disposed of properly in waste containers.
- Fuel tanks will be fitted with a secondary containment product, sized to 110 percent capacity.
- Proper cleaning of canteen.
- Proper disposal of waste from the infirmary.
- Employ Integrated Pest Management Principles

  – The need for pesticide use in the project design will be eliminated and/or reduced by:

    - Planting pest-resistant or well-adapted plant varietals such as native plants

    - Discouraging pests by designing the site and landscape to employ pollution prevention as a first-line of defense.

Non-retail fuel dispensing areas shall comply with Standard Urban Stormwater Management Plan (SUSMP) Section 4.2 Principal 7.j and contain the following:

- Overhanging roof structure or canopy. The cover's minimum dimensions must be equal to or greater than the area within the grade break. The cover must not drain onto the fuel dispensing area and the downspouts must be routed to prevent drainage across the fueling area. The fueling area shall

drain to the project's treatment control BMP(s) prior to discharging to the storm water conveyance system.

- Paved with Portland cement concrete (or equivalent smooth impervious surface). The use of asphalt concrete shall be prohibited.
- Have an appropriate slope to prevent ponding, and must be separated from the rest of the site by a grade break that prevents run-on of runoff from surrounding areas.
- At a minimum, the concrete fuel dispensing area must extend 6.5 feet from the corner of each fuel dispenser, or the length at which the hose and nozzle assembly may be operated plus one foot, whichever is less.

When the swimming pool is emptied, discharge water will be de-chlorinated with a de-chlorination kit to less than one PPM chlorine, as stated in Section 67.805(d)(9). When the filters are cleaned or backwashed, the water will discharge to a septic tank that leeches into the ground. The amount of water associated with backwash of filters is relatively small and can be handled by the camp's leech fields.

Storage of hazardous materials shall meet SUSMP Source Control BMPs Section 4.2 Principal 4, as follows:

- Hazardous materials with the potential to contaminate urban runoff shall either be: (a) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevents contact with runoff or spillage to the storm water conveyance system; or (b) protected by secondary containment structures such as berms, dikes, or curbs.
- The storage area shall be paved and sufficiently impervious to contain leaks and spills.
- The storage area shall have a roof or awning to minimize direct precipitation within the secondary containment area.

**Treatment Control BMPs:**

Additionally, the following post-construction treatment control BMPs and BMP design Parameters are part of the project:

- Extended Detention Basins will be provided in Areas 1, 2, 3, 4, and 6. These basins will be used as the primary treatment control BMPs in these areas. These basins will detain low flows and the first flush of storm events, causing sediment and particulate matter to settle out. By removing particulates, the BMP also removes the pollutants attached to the particulates.
- Vegetated swales will be used in all areas as natural water quality treatment for pretreatment of runoff prior to discharge into the detention basins. For the southerly portion of Area 5, where proposed work is minimal and only involves the relocation of the maintenance and storage facilities, vegetated swales will be used as the primary treatment control BMPs. ~~the removal of heavy metals and sediments from runoff.~~
- Detention basins will be designed to treat the volume of runoff produced from a 24-hour 85$^{th}$ Percentile storm event by detaining the water for a minimum of 24 hours and a maximum of 72 hours. This detention time allows enough time for sediments and particulate matters to settle out of the

water, but should not create a vector control problem since the basin will be emptied. The detention basins will be unlined.

- The water quality outlet will be a perforated riser with hole size and number of holes designed to provide a detention time between 24 and 72 hours. This riser will also serve as the outlet control for the basin and will be perforated over its entire height. The diameter of the riser will be designed based on the critical condition in which the flow through the riser approaches the emergency spillway condition. All additional higher flows will be conveyed by the emergency spillway. The top edge of the riser will be analyzed as a weir. The riser diameter will be sized to handle the 10 year storm, and the emergency spillway will accommodate the 100 year storm event. Either a trash rack/debris screen will be placed on top and around the riser or a rock pile will be placed around the riser to prevent debris from clogging it. Calculations regarding the design of the riser pipe and emergency spillway are not included in this SWM~~M~~P, and will be made at the time of final engineering and preparation of final grading and/or improvement plans and the final hydrology/hydraulic study.

- The detention basin is preliminarily designed with 3:1 slopes to allow tracked vehicles to access the basin bottom for maintenance. Detention basins will be fenced for safety reasons. The size of the detention basins is calculated from the formulas recommended in *Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of practice No. 87*, (Fuscoe Engineering, 2006~~3~~).

- Vegetated swales are located within every developed area on-site. As the runoff flows through the swale, the vegetation will provide some removal of pollutants. Vegetated swales will be planted with native plants to minimize maintenance and irrigation needs. The main function of the swales is to act as a conveyance for storm water. In most areas, detention basins will be provided. Therefore, the swales will provide enhanced water quality treatment, but will not be the main treatment control BMP. In many areas, the swales may be steep due to topography constraints. These swales will need to be heavily planted to protect against erosion. As a result of the steeper slopes; however, the water quality treatment will be minimal.

- The maintenance area in Area 5 is the only area in which a vegetated swale will be used as a treatment control BMP. The vegetated swale will be designed with a maximum four percent slope. Ideally, the swale will have a one to two percent slope. The swale will be as long as possible to allow for the longest infiltration and filtration time. ~~There will be a minimum of nine minutes travel time through the swale to ensure proper water quality treatment.~~ The swale will be planted with County approved native vegetation. There will be minimal irrigation and maintenance required for native vegetation. The swale will be trapezoidal in shape with less than 3:1 side slopes. The bottom of the swale will be two to eight feet wide. The swale will be designed to convey two year storms without erosive velocities. It will also have enough capacity to convey the 10-year storm.

- A rain garden will be included in Area 2 as an infiltration BMP. The rain garden will be designed in accordance with the seven requirements the County places on infiltration BMPs.

~~It shall be noted that the project does not propose any infiltration BMPs. Therefore, restrictions on infiltration BMPs are not addressed in this report.~~ Although catch basin filter inserts are not proposed as a primary BMP for the project, any drainage structures near the fueling area will be fitted with catch basin inserts as a spill control measure.

**Operations and Maintenance**

The Salvation Army will be responsible for the maintenance and funding of all post-construction BMPs. No easements or agreements relating to long-term BMP maintenance are needed since the BMPs are private and are located on private property. The Retreat Center is currently staffed with employees that take care of the camp grounds. This staff will also be responsible for maintaining the various BMPs. The grounds superintendent will keep a log of maintenance activities and evaluation of BMP conditions.

The Salvation Army will also be responsible for funding the BMP maintenance. This funding will be included in its annual maintenance budget. The estimated maintenance costs are $8,000 to $10,000 per year. The majority of the costs will be time spent by the Salvation Army's maintenance staff to maintain and inspect BMPs. Any money left over in the budget should be put into a "contingency fund" and used in the event a large amount of maintenance work is required.

If the project is approved, the following requirements will be included as Conditions of Approval. Satisfaction of these conditions would be required prior to use and reliance.

(1) Submit a complete “Engineer’s Report for BMP Maintenance”.

(2) Dedicate all treatment control BMPs to the County of San Diego in accordance with the County Watershed Protection, Stormwater Management, and Discharge Control Ordinance.

(3) Form a "Stormwater Maintenance Zone" under the County Flood Control District, including taking all actions and submitting all required forms.

(4) Deposit $4,000, and pay all costs associated with reviewing the Engineer’s Report and formation of the "Stormwater Maintenance Zone".

(5) Pay an amount equal to twenty-four (24) months of maintenance for the entire project as estimated in the approved Engineer’s Report.

The following BMP maintenance plan guidelines shall be adhered to as part of the project:

- The detention basins are Second Category BMPs. Inspections of detention basins will occur once to twice a month by the maintenance staff. Inspections will also occur after large storm events and on a weekly basis during periods of wet weather. An agreement will be entered into with the County, which will ~~function two ways~~ require:
  - ~~it will commit t~~The land to be~~ing~~ used only for the purposes of the BMP; and,

– ~~it will include an agreement by t~~The landowner and future owners, to maintain the facilities in accordance with the SWM~~M~~P. ~~(this obligation will be passed on to future purchasers or successors of the landowner, as a covenant).~~

- Trash and debris will be removed from detention basins on an as-needed basis. The outlet riser will be inspected and debris and sediment removed as often as necessary to ensure the riser functions properly. Any accumulated materials will be removed immediately from the basin when the detention volume is decreased by approximately ten percent or the sediment is 18 inches deep. The materials will be removed by the maintenance staff. Removed materials are not considered hazardous waste and can be disposed of as landscaping material. If it is determined that hazardous waste has been deposited into the basin, the suspected waste will be analyzed to determine disposal options.
- Vegetation in the basin should be kept to a maximum height of 18 inches. Vegetation will be trimmed and mowed as necessary, trees and woody vegetation shall be removed.
- The banks of the basin will be inspected for vegetative stabilization. Banks will be replanted as necessary. If erosion has been severe, other measures should be taken. Erosion control blankets or sodding should be used. Banks will also be inspected for structural integrity. Any repairs will be made within 10 working days.
- Fences will be inspected along with regular inspections. Fence repairs needed to protect the security of the site will be performed within 10 days.
- Vegetated swales are First Category BMPs. Inspections of vegetated swales will also occur once a month by the maintenance staff. Additionally, inspections will occur after large storm events and on a weekly basis during periods of wet weather.
- If standing water is observed, it will be removed to prevent any mosquito breeding or aquatic plant growth.
- Trash and debris and any other obstructions will be removed as necessary.
- Landscaping maintenance will be necessary for the plants. The swales will be planted with native vegetation rather than non-native grass seed, minimizing the extent of landscape maintenance. As this maintenance occurs, exposed soils will be raked to break up the surface and to mix any settled fines into the soil. If clogging is observed, it may be necessary to remove some of the accumulated soils. If erosion is occurring, erosion blankets, riprap, or additional planting will be used to minimize the erosion.
- Parking lots will be swept periodically to remove significant accumulations of oil, grease, trash and debris. Sweeping can be done either manually or with a street sweeper. Accumulated debris will be removed from the parking lots and disposed of in a covered trash receptacle to prevent any wind dispersion. During the first year of operation, parking lots will be swept monthly. After the first year, the frequency of sweeping will be re-considered and adjusted (either more or less frequently) as site conditions require to ensure that run-off would not contain pollutants.

- Yearly training of employees will be conducted. Training will include review of previously discussed instructions and formal training of new employees.
- Material storage area will be checked monthly to ensure that there has been no damage to it. The material storage area will also be checked weekly during the wet season ~~And~~ to make sure there is no source of potential contact with storm water, such as a leak in the roof.
- Dumpster will be checked weekly to ensure cover is not damaged and that it fully covers dumpster.
- Secondary containment product for the fuel tank will be checked monthly to ensure that is still in good condition and able to intercept any fuel spill.
- Steps taken to de-chlorinate the swimming pool water will be documented.
- BMP inspections and modifications will be documented.

### *6.1.3.1 Site Drainage Patterns and Runoff*

Several ephemeral and intermittent drainages pass through or are contiguous to the project site. Three of these drainages are noted as "blue line" streams on the San Vicente Reservoir 7.5-minute USGS Quadrangle map. The largest of these drainages, noted on the quad map as the West Branch of San Vicente Creek, flows from north to south parallel to Mussey Grade Road. The remaining drainages on the site, including the two remaining "blue line" streams, generally trend west to east and either discharge directly into or are otherwise hydrologically connected to the West Branch of San Vicente Creek. The West Branch runs contiguous to the northern portion of the eastern site boundary and enters San Vicente Reservoir approximately three miles south of this point. Discharge from San Vicente Reservoir is through San Vicente Creek, which flows into the San Diego River.

The proposed project will not significantly alter drainage patterns on the site. The existing drainage from the site is discharged over a relatively large area. There are a few concrete swales that direct the water to prevent erosion. They discharge into large open areas where the water velocity is slowed and the water is absorbed into the ground.

The proposed project will route runoff via vegetated swales and storm drain pipes and will mitigate the increased discharge through the use of on-site detention basins. The vegetated swales will direct the water from the developed areas to detention basins, either directly or via storm drain structures. The basins will limit the post-construction run off discharges and velocities to pre-development conditions. In addition, riprap will be placed at the outlet pipes to decrease the velocity of the released water. A final hydrology report will be submitted to the County of San Diego for approval with the grading plan submittal. Because no significant alterations to drainage patterns and no increase in runoff discharge or velocity would occur with project implementation, no significant impact to drainage patterns or runoff impacts would occur.

### *6.1.3.2 Surface ~~and Ground~~ Water Quality*

The main potential pollutants due to construction activity are sediment and construction material waste. Sediment is possible from grading operations, erosion, and poor stockpile management. Construction material waste results from improper handling and disposal of waste materials such as empty bags of

cement or empty cans of paint and not having a designated concrete wash out area. These wastes can pollute storm water if not handled and disposed of properly. However, ~~best management practices~~ BMPs as required under County WPO and discussed in project components (Section 1) such as use of desilting basins, water conservation techniques and spill prevention and control would prevent significant water quality impacts during construction by properly storing construction materials and preventing erosion and runoff contamination. Impacts would be less than significant.

The proposed project is classified as "Commercial Development > 100,000 square feet." This classification refers to any development on private land that is not exclusively heavy industrial or residential uses, including but not limited to recreational facilities. The proposed project is also classified under the category of "Parking Lots," which is a land area or facility for the temporary parking or storage of motor vehicles used personally, or for business or commerce. Anticipated and potential pollutants for these classifications, as provided in Table 3.1 of the County of San Diego SUSMP, include: sediments, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, and pesticides. However, BMPs as required under County WPO and discussed in project components (Section 1) such as use of vegetated swales and desilting basins, spill prevention and control techniques, and street sweeping would prevent significant post-construction water quality impacts by properly maintaining the facilities in order to prevent erosion and runoff contamination. Impacts would be less than significant.

The canteen proposed with the project is a very small camp store that would provide basic provisions for camp users. No additional parking, loading, hazardous materials areas, etc. are associated with this use. The infirmary proposed with the project will involve application of first aid to camp visitors with relatively minor (e.g. headaches, cuts and scrapes, sunburn, insect bites) ailments, and would not involve the generation of hazardous medical wastes. The operation of either the canteen or the infirmary will not involve uses that represent potential water quality impacts and no additional impacts are associated with these uses.

The use of herbicides is not anticipated for the project, however the potential exists for herbicides (specifically weed killer) to be used in small quantities on site. In the unlikely event that herbicides are used on site, they will be used in accordance with standard application practices, which will not affect water quality. The use of pesticides is not anticipated with this project.

~~The vast majority of the expanded Camp/Retreat site will remain undeveloped. Much of the developed area will be used for housing facilities. The potential pollutants from these housing facilities are trash and debris and cleaning agents. Landscape debris will be minimal since most landscaping will be natural. As a result, little to no fertilizers will be used on site. Weed killer; however, is a potential pollutant. There is also a dining facility on site. Excess grease is an unlikely pollutant; however, because the plumbing code requires grease traps. Pollution in the form of human waste is highly unlikely since the toilets and showers would be directly connected with the camp's septic system, which has been designed and sized in conformance with all County of San Diego Environmental Health requirements and has been reviewed by the County of San Diego Department of Environmental Health. The housing facilities will be serviced with small propane gas tanks. These tanks have the potential to pollute storm water if they leak. However, BMPs as outlined in Section 1 and required by the County WPO including employee training, maintenance restrictions, and~~

proper chemical storage requirements would be implemented, and would reduce these potential impacts to less than significant.

There will be a limited amount of traffic entering and leaving the camp site. The camp site has multiple parking areas. The traffic has the potential to pollute runoff from vehicles. The camp will also have a new swimming pool. The swimming pool has the potential to pollute runoff if the backwash and emptied water are not treated properly prior to disposal. This potential is minimal; however, since the swimming pool is rarely emptied. The swimming pool chemicals, mainly chlorine and muriatic acid, are potential pollutants if they are not properly stored. The camp site also has a small picnic area. Trash and debris could pollute the runoff if not disposed of properly. However, BMPs as outlined in Section 1 and required by law, including parking lot sweeping, pool water dechlorination requirements, chemical storage requirements and employee training, would be implemented, reducing potential impacts to less than significant.

Area 6 is located east of the main access road. In order to provide access to this area, a crossing needs to be built across the West Branch of the San Vicente Creek. Runoff from Area 6 will be tributary to the creek. This runoff has the potential to pollute the creek from its parking areas, roads, and guest housing facilities and is located close to the creek. However, pursuant to the BMPs required by the law and outlined in Section 1, asphalt berms will be placed along the road to prevent potential erosion and sediment pollution to the creek. In addition, vegetated swales will be used to route the runoff around the improved site. Runoff within the access ring road will be guided to catch basins, which will release the runoff into the detention basins where water quality treatment will be provided, including the removal of heavy metals, trash and debris, oil and grease, and sediments. The detention basin will also reduce the peak runoff to pre-development conditions, minimizing erosion around the creek area. The access road in and out of Area 6 is not tributary to the detention basin due to elevation differences. It is anticipated that the potential pollutants from this access road are minimal. The street will be swept by dry methods to remove any pollutants that may accumulate from vehicular traffic. These measures will ensure that the runoff tributary to the creek is free of pollutants. Impacts would be less than significant.

The maintenance facilities area poses a large potential for pollutants. The area will be used to maintain and house camp vehicles and to store maintenance materials. Two above ground diesel and gasoline fuel storage tanks will also be kept in this area and could pollute storm water runoff if a leak occurs. The maintenance of vehicles will also create potential pollutants such as oil, grease, heavy metals, and debris. The materials on site, if not properly stored, present potential pollutants to the runoff. However, The San Diego County Department of Environmental Health (DEH) requires a Business Plan for businesses which use, handle, or store more than 55 gallons of hazardous substance. The Business Plan contains basic information about the location, type, quantity, and health risks of the hazardous materials stored, used or disposed of by a business. The Salvation Army currently has a Business Plan for the two above ground fuel storage tanks (Hazardous Materials Business Plan H35642). The existing Business Plan will be amended and approved by DEH prior to any activity involving the tanks. Upgrades to the tanks will be performed if determined necessary by the DEH or any other governing agency. Additionally, concrete pavement will be provided in the area under the fuel tank and will extend at least 6.5 feet from the corner of each fuel dispenser, as detailed in the County of San Diego's Storm Water Standards Manual. These measures would preclude significant water quality impacts that could occur due to potential tanks leaks or spills.

As described above in Section 6.1.2.3, the project proposes septic systems with leach fields. The leach fields will be designed and constructed in accordance with County of San Diego DEH standards at the time of final engineering. Therefore, impact from the leach field on surface water is not anticipated.

The proposed project also includes excavation of the existing non-toxic landfill and disposal~~e~~ of the materials at the Ramona Landfill. Upon review of the materials contained in the landfill, no hazardous waste was identified. Furthermore, the excavation would be carried out in accordance with all applicable laws and regulations. Therefore, excavation of the landfill would not result in a significant Hydrology/Water Quality impact.

### *6.1.3.3 Groundwater Quantity*

Although the project site contains two wells and a natural spring, the Salvation Army property is currently served by the Ramona Municipal Water District for potable water. The wells are located in the vicinity of the existing administration office and within the cabin camping area. They are currently capped and not in use. In addition, the existing natural spring located west of the pool area is not a source of potable water for the camp. The spring has been fenced off to prevent any potential danger to visitors. The proposed project does not propose to use groundwater for any purpose. Therefore, impacts associated with an increase in demand on groundwater quantity would be less than significant.

As described above in Section 6.1.2.3, the project proposes septic systems with leach fields. The leach fields will be designed and constructed in accordance with County of San Diego DEH standards at the time of final engineering. Therefore, the installation of leach fields would not cause a significant impact to groundwater.

Implementation of the Best Management Practices outlined in the Stormwater Management ~~and Maintenance~~ Plan (Appendix G) prepared for the project in compliance with the WPO will reduce impacts to Hydrology/Water Quality to less than significant.

# 6.2 Effects Found not to be Significant During Initial Study

The following are the environmental issues that were found not to be significant during preparation of the Environmental Initial Study (Appendix A):

## 6.2.1 Air Quality

The proposed expansion and operation of a youth camp would result in minor production of air contaminants. Equipment exhaust would be released during temporary construction activities, particularly from mobile sources during site preparation and from on-site equipment during actual construction. Diesel particulates have recently been added to the California "toxics hot spots" program (AB-1817, Tanner). However, the construction activities required for the project are anticipated to fall far below the County screening criteria (Table 6-1) and are not expected to result in emissions levels that would cause "toxic hot spots." The use of five scrapers, a bulldozer and a grader results in total hourly emissions of 1.6 pounds of carbon monoxide, 0.43 pounds of reactive organic gases, 5.81 pounds of nitrogen oxides, 0.69 pounds of

sulfur dioxide and 0.58 pounds of respirable particulate matter ($PM_{10}$); and total daily emissions of 31.1 pounds of carbon dioxide, 7.0 pounds of reactive organic gases, 98.5 pounds of nitrogen oxides, 11.7 pounds of sulfur dioxide and 10.4 pounds of respirable particulate matter ($PM_{10}$) (U.S. Environmental Protection Agency, 1995). Since the project would use less equipment than used in the example scenario above and would be built over a period of approximately 20 years, as funding is available, construction emissions would be below County screening criteria levels (Table 6-1) and impacts would be less than significant.

The traffic analysis concludes that the project would contribute 0.01 volume/capacity ratio on SR-67. The segment Level of Service (LOS) would remain at LOS C on Mussey Grade Road. Implementation of the proposed project would neither significantly change vehicular emissions patterns nor would it result in emissions that would violate any air quality standards in the San Diego Air Basin. The SR-67/Mussey Grade Road intersection LOS would remain at LOS D during the AM peak-hour and LOS E during the PM peak-hour with or without implementation of the proposed project. Similarly, the SR-67/Archie Moore Road intersection would remain at LOS F during the AM peak-hour and LOS C during the PM peak-hour with or without the project. The project would contribute a 1.16-second delay during the AM peak-hour and a 0.4-second delay during the PM peak-hour at the SR-67/Mussey Grade Road intersection. The project would contribute a 8.8-second delay during the AM peak-hour and a 0.3-second delay during the PM peak-hour at the SR-67/Archie Moore Road intersection. Although the AM peak-hour at the SR-67/Archie Moore Road intersection would continue to operate at LOS F, the increase in delay is 8.8 seconds and is not long enough in duration to produce microscale hot spots and significant CO hotspot impacts would not result.

Some diesel-powered vans and/or busses may be used to transport campers to and from the project site. Though they emit smaller quantities of carbon dioxide, diesel engines emit higher quantities of particulate matter (PM) and nitrogen oxides ($NO_x$), the latter a precursor to particulates and smog. In addition to contributing to smog problems, diesel exhaust has recently been classified as a probable human carcinogen by the International Agency for Research on Cancer; the U.S. Environmental Protection Agency has proposed the same classification. High level exposure to diesel exhaust has been found to cause lung tumors in rats, and studies of humans that are routinely exposed to diesel fumes indicate a greater risk of lung cancer. For example, occupational studies of workers at railroad, dock, trucking, and bus garage exposed to high levels of diesel exhaust over many years demonstrate a 20 to 50 percent increase in the risk of lung cancer or mortality (Union of Concerned Scientists, 2002).

The maximum number of users would be 748 with a total of 275 ADTs (11 inbound/1 outbound AM peak hour and 21 inbound/1 outbound PM peak hour trips). Because this is a relatively small number of trips with very few trips occurring during AM and PM peak traffic hours, diesel emissions associated with camper transport would not result in a significant air quality impact.

The project will not result in emissions of air pollutants that exceed the County's screening levels, and as such will not result in substantial pollutant concentrations, and given that no sensitive receptors (including, but not limited to, schools, hospitals, resident care facilities, or day care centers) are located in the immediate vicinity of the project, the project will not significantly impact any sensitive receptors through exposure to substantial pollution concentrations.

## 6.2.2 Transportation/Traffic

Although Transportation/Traffic was determined to not result in a significant impact during the preparation of the Environmental Initial Study, a complete Traffic Impact Assessment (TIA) ~~Study~~ was prepared by Linscott, Law and Greenspan Engineers (LLG, ~~2005~~ 2009 [EIR Appendix E]). This section briefly summarizes the results of the traffic study.

The County provided draft guidelines for determining significant traffic impacts (Table 3-2). In general, if the project alone exceeds the identified thresholds, the impacts are determined to be a direct significant impact.

The traffic study also analyzes segments of SR-67 in the community of Ramona using the County of San Diego's methodology identified for two-lane highway segments with signalized intersection spacing over one mile. LOS E operations are identified when volume on a two-lane highway exceeds 16,200 ADT. LOS F operations are identified when volumes exceed 22,900 ADT. Allowable increases in project traffic are limited to 325 ADT and 225 ADT for LOS E and LOS F-operating two lane highways, respectively. ~~peak hour two-lane highway analysis methods contained in the Highway Capacity Manual. These segments were assessed by calculating the decrease in speed and increase in "percent time following" due to the addition of project traffic on the highway segment during the peak hour in the peak direction. This method of analysis is appropriate because SR-67 is not a County road, but is a two-lane State highway.~~

~~The County General Plan Public Facilities Element includes goals, objectives, policies, and implementation measures to ensure a properly functioning regional circulation network. Policy 1.1, Implementation Measure 1.1.3, states as follows:~~

> ~~*"Require, as a condition of approval of discretionary projects which have a significant impact on roadways, improvements or other measures necessary to mitigate traffic impacts to avoid reduction in the existing Level of Service below "D" on off-site and on-site abutting Circulation Element roads. New development that would significantly impact congestion on roads at LOS "E" or "F", either currently or as a result of the project, will be denied unless improvements are scheduled to increase the LOS to "D" or better or appropriate mitigation is provided. Appropriate mitigation would include a fair share contribution to an established program or project. If impacts cannot be mitigated, the project will be denied unless a specific statement of overriding findings is made pursuant to Section 15091(b) and 15093 of the State CEQA Guidelines."*~~

Therefore, if a project does not ~~"significantly impact congestion,"~~ exceed the LOS E/LOS F thresholds identified above, project impacts on the two-lane highway segment would not be significant.

The Salvation Army Divisional Camp and Retreat currently operates and will continue to operate year-round with the proposed project expansion, with operations generally divided into two seasons: 1) Camp (summer), which includes youth camping for eight weeks during mid-June to mid-August; and 2) Retreat, which includes Salvation Army group retreats and private rentals for the balance of the year. The campers stay for one week, and ~~generally~~ arrive on Monday afternoons (between 2:00 and 4:00 p.m.) in passenger vans and buses and depart on Saturday morning (between 9:00 and 10:00 a.m.), thereby avoiding peak

commuter hours. Camp staff ~~generally~~ arrives on Monday mornings and departs on Saturday afternoons, with one-half remaining for the duration of the season. The Retreat groups ~~generally~~ arrive on Friday evenings (after 6:00 p.m.). Most Retreat visitors arrive by van or carpool (Appendix E). These groups leave on Sundays around midday. Finally, it is assumed that there will be an average of ten miscellaneous/delivery trips on any given weekday, of which one round-trip is assumed during both the AM and PM peak-hours. These trips would include staff trips into Ramona for supplies, etc. However, it is possible that both the summer camp and Retreat Center uses could occur simultaneously. Therefore, the project traffic generation was calculated in a worst case analysis at full buildout for the maximum number of potential users associated with the Applicant's Preferred Alternative (748 users and 10 miscellaneous deliveries/trips). As explained in the Introduction chapter to this Final EIR, the Reduced Project Alternative I (615 total users) is the alternative that is being carried forward to decisionmakers for approval. The traffic analysis assesses the potential impacts of the larger, 748-user project. Therefore, the findings of the traffic analysis are considered conservative as they are based on a larger project than what is currently proposed.

The traffic study considered how users arrive by utilizing Vehicle Occupancy Ratios (VORs). These ratios account for multiple users in vehicles (i.e. carpools, vanpools, buses), which is an important aspect of this project's day-to-day operations. Based on past experience for events at the site, the applicant estimates that 40 percent of retreat guests arrive by van, 40 percent by carpool, while 20 percent are single occupancy. To further substantiate these percentages, data were obtained from the existing 78-acre Oakbridge Camp, which is located a few miles from the site. The EIR for the expansion of the camp was certified on December 4, 2002 (P77-055W). The Oakbridge Camp tracks their arrivals in terms of number of guests and number of vehicles. This camp is smaller but is also in a rural setting and since both are youth camps and the activities at the two camps are similar, it is logical that the carpool and vanpool arrival percentages would be similar. The Oakbridge Camp average auto occupancy was 2.7, and their average van occupancy was 14.6.

Many of the Salvation Army users would arrive via passenger vans and carpools. The VOR assumed for campers is 15 per vanpool. The VOR for staff and miscellaneous deliveries is two and one, respectively. The VOR for Retreat Center guests is 2.33. These occupancy rates closely match the Oakbridge Camp rates. This VOR assumes 40 percent vanpool (15/van), 40 percent carpool (two/car) and 20 percent drive alone (one/year). This is equal to 175 guests arriving in 75 vehicles for an average of 2.33 guests per vehicle.

If the project is approved, the Major Use Permit Modification includes a condition that requires the project applicant to assign an employee to maintain a daily vehicle log book to record the number of trips to and from the camp and retreat, all arrival/departure times and the type of vehicle (car, van, bus, etc.). The log book shall be available upon request to DPLU. This condition would allow a comparison of actual project operations within the specific counts outlined in the Traffic Impact Assessment. Also, MUP conditions include that temporary special events shall be limited to four per year and the total site occupancy shall not exceed 615 persons even during a special event. The applicant shall plan the special events so they do not start or end the peak traffic times identified in the Traffic Impact Assessment. Visitors to the retreat center shall be encouraged to carpool or vanpool. Youth campers shall be transported to and from the camp by buses or vans.

The project will continue to implement a program that limits weekday peak hour trips. The following project features have been incorporated into the project in order to reduce or eliminate traffic impacts and will be conditions of the project Major Use Permit if the County approves the project (Chapter 1):

- Youth campers, who comprise the majority of camp users, shall continue to be transported to and from the camp via bus or vanpool.
- The Retreat Center rental contract shall recommend bus, van or carpool be the mode of transportation.

The project-generated traffic was distributed to the street system based on project access, the characteristics of the roadway system, conversations with Salvation Army staff, and the project site's location relative to metropolitan areas. Ninety percent of the Retreat Center trips were estimated to come from the west, while 90 percent of the staff trips were estimated to come from the east.

Implementation of the proposed project would result in 275 Average Daily Trips (11 inbound/1 outbound AM peak hour and 21 inbound/1 outbound PM peak hour trips). Table 3-3 shows that the project traffic contribution is 212 ADT to the segment of SR-67 analyzed, which continues to operate at LOS F. The Mussey Grade Road street segments remain at an acceptable level of service, as the addition of project traffic does not degrade operations to below LOS B using circulation-element two-lane road capacity, nor does it ~~does not~~ breach the 4,500 ADT capacity of a non circulation element road (Table 3-3). The traffic study concludes that the project would not exceed the County threshold for intersections (Table 3-2).

Table 3-4 shows that with the addition of project traffic to the two-lane highway segment, the SR 67 segment in the project area continues to operate at LOS ~~E~~ F~~.~~ ~~during the AM peak hour and LOS F in the PM peak hour.~~ The maximum project-attributable increase in ADT to the segment is 212 ADT. This is less than the allowed increase of 225 ADT. ~~decrease in speed on the segment is calculated at 0.1 mph. The "percent time following" increases by 0.1 mph and the queue increase is a maximum of two vehicles due to the project. These fractional speed changes would not be noticeable to the average driver, and would not be considered to "significantly impact congestion", as described in the County Public Facilities Element.~~ Therefore, implementation of the proposed project would not result in significant direct impacts to area road segments.

Table 3-5~~6~~ shows that the minor-street movements ~~critical approaches~~ at both unsignalized intersections continue to operate at LOS F. ~~E or worse~~ during at least one peak hour. If the traffic from the project caused excessive queuing at the critical movement, the project traffic would result in a significant impact. Table 3-6 shows that the project would not cause excessive queuing. Therefore, the project does not cause a significant direct impact to these intersections ~~with the addition of the very small amount of project traffic. However, the project does not exceed the five trips allowed at an LOS F – operating unsignalized intersection~~ (EIR Appendix E, Figure 7).

Table 3-5~~6~~ also shows the peak hour LOS at the signalized SR 67/ Dye Road/ Highland Valley Road intersection. This intersection is calculated to continue to operate at LOS E and LOS D during the AM and PM peak hours, respectively. The project generated traffic does not increase the delay by more than 2.0

seconds which is the significance threshold for a signalized intersection operating at LOS E. Therefore, there is no significant direct impact at this intersection. ~~The project does not exceed the 20 trips/ 2.0 second delay increase allowed at an LOS E operating unsignalized intersection.~~

## 6.2.3 Paleontological Resources

A review of paleontological maps provided by the San Diego Museum of Natural History indicates that the project is not located on geological formations that contain significant paleontological resources. The geological formations that underlie the project have a low probability of containing paleontological resources. Additionally, based on a review of the Geologic Map of California, San Diego - El Centro Sheet (1962), geologic formations underlying the project site consist of Mesozoic granitic rocks (gr) and a small portion of Jura - Trias meta volcanic rocks. These geologic formations are plutonic rocks formed under intense heat, thereby, destroying any potential for the existence of fossils under the project site. Impacts to paleontological resources would not be significant.

## 6.2.4 Public Services

### *6.2.4.1 Police Protection*

The San Diego County Sheriff's Department provides police protection to the proposed project site. In addition, reciprocal-aid agreements are in effect with the neighboring City of Poway. Under this agreement, the City of Poway's Sheriff's Department would assist the Sheriffs Department in Ramona if an emergency situation required additional support. The Sheriff's Department operates a substation in the Ramona Town Center at 1424 Montecito Road, with a staff of 16 officers and three volunteers. The Ramona Sheriff's Department has indicated that average response times are 10.6 minutes for priority calls to 16.0 minutes for non-priority calls. Response times currently exceed the response period goal of approximately five minutes for the Ramona Planning Area. The Ramona Sheriff's Department provided a general statement that they are currently understaffed and unable to meet the response time goal of five minutes, (average response time for priority calls is 10.6 minutes). However, it was also indicated that the existing Salvation Army site has not placed a demand on police services (Pers. Comm. Sergeant L. Rodriguez, Ramona Sheriff's Substation, February 2001), and it is assumed that since the project would continue similar types of camp uses, it would not generate additional calls. The project would not require the expansion of existing police protection facilities or the development of new facilities. As such, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities.

### *6.2.4.2 Fire Protection*

The Ramona Department (RFD) boundaries correspond to the Ramona Municipal Water District's (RMWD) service boundaries, which serves roughly 22,000 people located in the Town Center, San Diego Country Estates, the Highland Valley region, and various other outlying areas. RFD currently operates three stations that could serve the site, depending on the type of response necessary. The closest RFD station that serves the property site is Station 82, located at 3410 Dye Road. Station 82 has a minimum of three firefighters on call at all times and has one Type ~~I~~II Engine. The RFD has indicated that the average emergency response time is approximately seven to ten minutes. Station 82 is located approximately 2.4 miles from the project

site's access gate, or 3.7 miles from the primary site parking lot. The structures proposed on the project site do not exceed height limits above which a ladder truck would be required. According to the RFD Fire Marshal, the RFD's existing and planned fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the project site is approximately 4.5 minutes (FPP, 2009~~7~~). The RFD is under contract with Cal Fire. Secondary response would be provided from other RFD Fire Stations as needed. Cal Fire's Mt. Woodson Station, a "Cal Fire Schedule B Station," includes one Type I~~I~~II engine with three personnel at all times. The Mt. Woodson Station also has two engines and engine companies scheduled for peak fire season, April 15th to December ~~1st~~ 15th of each year. Mutual aid agreements are in place and would include Cal Fire's air attack capabilities, if necessary.

~~The Project Facility Availability Form provided by the Ramona Fire Department Fire Marshall (June 2006) provides Fire Department input regarding response time. The form states that "Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is 4 1/2 minutes." According to calculations, the linear distance of 19,536 feet from Fire Station No. 82 to the Camp's entrance would require an average response speed of just less than 50 mph for a 4.5-minute response time. It is estimated that average speed would be closer to 40 mph, resulting in an estimated response time of 5.5 minutes.~~

When measured to the furthest reaches of the proposed camp, the distance from Fire Station No. 82 is approximately four miles or 21,260 linear feet. Pursuant to National Fire Protection Association (NFPA) 1142 Table C.11(b), the travel time at 35 mph would be 7.45 minutes. This project is in the County General Plan Estate Development Area Regional Category and the Rural Development Area Regional Categories. Pursuant to the table on page XII-11-11 of the Public Facility Element Part XII of the General Plan, a maximum travel time of ten minutes is required. Therefore, this project complies with the General Plan.

### Estimated Calls and Demand for Service from the Project

Using San Diego County fire agencies' estimate of 82 annual calls per 1,000 population, the Project's estimated 61~~54~~1 maximum visitors and guests (under Reduced Project Alternative I), which will vary throughout the year and will likely average 150 throughout the course of the year, would generate up to 13 calls per year (less than 0.04 calls per day), 85 percent of which (11 per year) are expected to be medical-related calls. Over the last three years, there have been no fire calls and an estimated nine medical-related calls (pers. comm., D. Patton, October 2007) or three per year. This is based on an average population of approximately 50 people at the Camp over this time frame and compares favorably with the projected demand associated with the Camp expansion.

### Response Capability Impact Assessment and Mitigation

It is anticipated that the fire-related calls will decrease while medical-related calls would increase slightly. Service level requirements are not expected to be significantly impacted with the increase of less than 0.04 calls per day for a station that currently responds to just over one call per day in its primary service area. Therefore, the project is not expected to cause a decline in the RFPD response times. The requirements

described in the proposed FPP are intended to aid firefighting personnel and minimize the demand placed on the existing emergency service system.

A FPP has been prepared for the proposed project. The Camp will implement fire safety requirements included in the FPP in order to help prevent the spread of wildfires to camp buildings.
The proposed project includes annexation of a 10.8-acre parcel located in the north-central portion of the project site where the educational camp is proposed. Should this parcel not be annexed, it would fall within the jurisdiction of the Cal Fire with the remaining project site under the jurisdiction of the RFD. Pursuant to discussions with these agencies, it was noted that either protection service has adequate facilities to serve the project and that no additional fire protection equipment or personnel would be required. The project would not require the expansion of existing fire protection facilities or the development of new facilities. As such, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities.

### *6.2.4.3 Schools*

School services in Ramona are provided by the Ramona Unified School District (RUSD). RUSD has a current enrollment of 7,019 students in grades kindergarten through 12. RUSD has experienced a steady increase in enrollment over the last several years, reflecting growth patterns in the area (Ramona Unified School District, 2000). The Salvation Army Divisional Camp and Retreat is a recreational land use and as such, would not contribute to an increase in school enrollment. Therefore, no significant impact would occur (Ramona Community Plan, 1995).

## TABLE 6-1
## Screening-Level Criteria for Air Quality Impacts

| Pollutant | Total Emissions | | |
|---|---|---|---|
| | Lb. Per Hr. | Lb. Per Day | Tons Per Year |
| Respirable Particulate Matter ($IPM_{10}$) | — | 100 | 15 |
| Oxides of Nitrogen ($NO_X$) | 25 | 250 | 40 |
| Oxides of Sulfur ($SO_X$) | 25 | 250 | 40 |
| Carbon Monoxide (CO) | 100 | 550 | 100 |
| Lead and Lead Components | — | 3.2 | 0.6 |
| Volatile Organic Compounds (VOCs)* | — | 55 | 10** |

Notes: * = Threshold for VOCs based on the threshold of significance for reactive organic gases from Chapter 6 of the CEQA Air Quality Handbook of the South Coast Air Quality Management District.
** = 10 Tons Per Year threshold based on 55 lbs/day times 365 days/year divided by 2000 lbs/ton.
Source: County of San Diego, Department of Planning and Land Use, Air Quality Analysis Format Guidelines, December 2000.

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